

0356

478A.TXD980508808 0001
ZOECON INDUSTRIES
FARMERS BRANCH, TX 75234

0508808
VOL 01



000000031973 PZ/RC/NT



478A.TXD980508808 0001

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8

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8

0357

**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

TXD-98-050-8808

ZOECON INDUSTRIES
P.O. BOX 340231
DALLAS, TX 75234

INSTALLATION ADDRESS

12847 VALLEY BRANCH
FARMERS BRANCH, TX 75234

0358

ENTF

1XD986508808

RECORD OF COMMUNICATION		<input type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
(Record of item checked above)			
TO: Dr. Norwood Hill		FROM: Samuel Coleman Christina Vail	
		DATE: 24 May 89	
		TIME: 1630	
SUBJECT Zoecon Site located in Farmers Branch, Texas			
SUMMARY OF COMMUNICATION <p>Ms. Vail and I contacted Dr. Hill at approximately 1630 on May 24, 1989. I asked Dr. Hill if he had a specific question about Zoecon that we could help him with. He said he had lived in the area and was wondering if there was any problem with the drinking water. He was sure that he had water service from Dallas, but was curious anyway. Ms. Vail advised him that Zoecon was under a corrective action order issued by the Texas Water Commission (TWC), and that Zoecon was employing a pump and treat system in wells approximately 25 to 50 feet deep. We went on to explain that the contamination involved pesticides that tended not to migrate through soils. Dr. Hill was familiar with this. We pointed out that any drinking water well would be at a substantially greater depth.</p> <p>Dr. Hill asked if anything was being done to treat the soil in conjunction with the water treatment. We advised him that nothing was being done. However, Zoecon had removed some contaminated soil in 1986 at the same time they removed some underground storage tanks.</p> <p>Dr. Hill thanked us and stated that he appreciated someone getting back with him. We asked if he had any other questions and advised him that TWC had the lead and was monitoring the situation. He said he had all the information he needed.</p>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED No further action			
INFORMATION COPIES TO: Davis (6H), Brown (6H-C)			

Zoecon
Dallas, Texas

Zoecon is a pesticide manufacturing plant located on the boarder between the city of Dallas and the city of Farmers Branch. The Farmers Branch Historical Park is located adjacent to the facility.

Zoecon is under a Corrective Action Order issued by TWC. The Order included soil + tank removal as well as a pump and treatment program for the shallow aquifer located beneath the facility.

The City of Farmers Branch has instigated its own sampling program in the Park to investigate any off-site contamination.

0360

RCRA Enforcement Branch
 (6H-C) 5-6745
 Texas Section Route Slip

ROUTE DATE SIGN

BROWN, Randall (Randy)
 Branch Chief (6H-C) X-6745

TREGONING, Harriet
 Chief ALONM (6H-CS) X-6754

TIDMORE, Guy
 Chief Technical (6H-CX) X-6665

THOMPSON, Linda
 Chief Oversight (6H-CO) X-6765

ANDERSON, Holly

BLACK, LaDonna

COOKS, Teresa

CROUTHER, Desi

MAIEFSKI, David

ROMO, Bonnie

TATES, Sam

TRUITT, Jerry

VAIL, Christina ✓

COMMENTS Bill Gallagher
used to be the POC
for this. Now you are
the POC. You and I
need to talk to Bill sometime soon

FROM: Samuel (Sam) Coleman, Chief
 Texas Section (6H-CT)
 RCRA Enforcement Branch 5/23
 X-6759

RCRA ENFORCEMENT BRANCH

	ROUTING	INITIAL
SAMUEL COLEMAN	✓	
HARRIET TREGONING		
LINDA THOMPSON		
GUY TIDMORE		
BETSY METCALF		
DANNA SMITH		
GUANITA REITER		
BILL HONKER		

AL DAVIS/JACK DIVITA

COMMENTS *You need to find out who knows about this site. It periodically gets hot when Sherrin Stinson stirs things up.*

Randy

FROM: RANDALL E. BROWN, CHIEF
RCRA ENFORCEMENT BRANCH

0362

5-19-89

4:45

Phil Charles

Zoecon - Test Well near Park

DMN Call

2.8 ppb dieldrin

148 ppb ethyl benzene

Phil will tell reporter

- we can't draw any conclusions
- QA/data credibility issues
- TWC is assessing site

0363

HAZARDOUS WASTE RCRA PERMITS BRANCH

6H-P

ROUTING

BILL GALLAGHER

BILL LUTHANS

TONY ROBLEDO

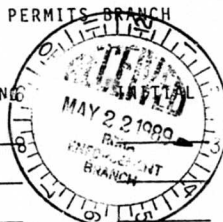
TOM CLARK

CAROL TEDFORD

GLORIA RONQUILLO

RANDALL BROWN

GUANITA REITER



COMMENTS

FYI. Phil may follow

up w/ you Mon.

5/19 FROM: BILL HONKER, CHIEF
HAZARDOUS WASTE RCRA PERMITS BRANCH (6H-P)
PHONE: 655-6770

Farmers Branch Times

Wednesday, February 22, 1989

Zoecon site samples could

By JANE GORE WHITLEDGE
Staff Writer

The Farmers Branch city council learned Monday that recent soil samples taken from the Historical Park near the Zoecon boundary line were not analysed in compliance with the Environmental Protection Agency standards. New samples taken just inches from the sites of the first samples reveal high levels of toxaphene, a carcinogenic pesticide.

The original samples indicated only acceptable levels of any constituents.

Tom Scales, director of community services, told the council that Tom McDougald, the city's environmental officer, had studied the sample analysis in-

formation and determined that the specific EPA time limits imposed on labs for analysing soil samples had not been met.

"When we first got the results we thought proper procedure had been followed," Scales said.

New samples were taken and analysed. The new results have not been seen by the city's environmental toxicology consultant, Dr. William Lowery, but were scheduled to be delivered to him Tuesday.

The second samples indicate 54 parts per million of toxaphene at site 18, which is farthest from the Zoecon boundary and 31 parts per million at site 19, which is only 23 feet from Zoecon. The Texas Water Commission has said that 4 parts per million is the acceptable limit.

Continued

be worse: Tests were old

Scales told the council toxaphene has been found in the park in the past. It was found in extremely high levels in the park area where soil was removed in 1986 because of apparent contamination.

The city council a few weeks ago directed the city staff to have independent samples taken after Zoecon officials said the corporation would only agree to test further for two constituents, xylene and benzene. The city has long been concerned with the proximity to the Historical Park of a chemical pesticide-producing plant and about hazards to the public from possible soil or groundwater contamination.

The city and Zoecon, which is in Dallas city limits, have both conducted extensive testing over the years. The TWC recently said Zoecon had met all that agen-

cy's requirements and no further testing needed to be done. But the city chose to do its own testing for a wide variety of constituents, hoping to end the speculation about the park and move on, councilmembers said.

City Manager Richard Escalante said Monday that as much as the city might want to move on, not enough evaluation had been done on this recent information "to call it a closed case."

The city will now begin a grid system to determine if the spots with the high toxaphene levels are hot spots or indicators of larger problems. More soil tests will be done around the area of the samples, according to Scales.

Turn to ZOECON, page 8A

(more)

Zoecon

From page 1A

According to McDougald the lab error became evident when he examined forms that are attached to the samples. McDougald said the second sampling had been analysed with great expediency, free of charge to the city.

McDougald noted that the city requested checks for as many as 55 constituents on the recent samples and only toxaphene and minute trace samples of DDD and DDE, products of DDT breaking down, were found.

Scales and Escalante also told the council Monday that a decision by the Dallas Planning Commission on Zoecon's request for rezoning had been delayed. Escalante explained that he and the city staff are concerned about storm water retention at Zoecon's facility and have requested that the new site plan contain allowances for storm water storage facilities. The Farmers Branch staff is concerned that if it isn't included in the site plan it will not be possible in the future.

Pine Bluff Commercial Grant County Quorum OKs Class 4 Landfill Near Sheridan

FEB 14 1989

SHERIDAN — The Grant County Quorum Court on Monday night approved a resolution seeking to open a Class 4 landfill west of Sheridan.

According to Judge Roy Baxley of Grant County, the resolution gives him permission to enter into an agreement with the state Pollution Control and Ecology Department, which has to rule on the request.

A Class 4 landfill allows for the dumping of trees, tires, appliances and other non-contaminating items, Baxley said. No household garbage may be dumped at the site.

The agreement with the PC&E states that, when the county is finished with the landfill, it will be properly covered or the county will pay a fine.

"Some of the residents in the

general area said that they do not have any problems with having the Class 4 out there," Baxley said this morning but added that residents did not favor a landfill that would allow household garbage or other possible contaminants to be dumped.

PC&E is in the process of reviewing the application, testing the soil, and giving public notice before it can grant final approval. Baxley said he did not anticipate any problems.

If approved, the landfill will be located about four miles west of Sheridan.

Wells contaminated
Next to former Branch Park
concerned citz. contain more offsite

TWC not doing enough
TWC has wells & pump & treat
(was not operate yet)
also soil removal.

Shane Jackson used to work lost job
now fights.

EPA look at TWC at this point adequate
TWC person assigned to cage.

Farmers Branch Times

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0369

RECORD OF COMMUNICATION

January 15, 1986

SUBJECT: Zoecon, Dallas, Texas

FROM: Shane Jackson (Citizens Against The Silence, CATS)

TO: Will Focht (6H-CE)

Earlier this week, Shane called me to inform me that he had recently obtained information regarding contamination at the Zoecon site and he wanted to submit this to EPA for its consideration. At that time I asked that Shane submit this information in writing.

At 1:40 p.m. on Thursday, January 15, 1987, Shane called me again to inform me that he had elected not to submit this information in writing, upon advice of his counsel. Shane intimated that his group was considering some form of legal action against TWC and/or some members of its staff to require additional investigation of the Zoecon site and environs, and possibly against certain staff members for apparent improprieties in dealings with Zoecon and the city of Dallas. He basically wanted EPA to know of his concerns so that we could take appropriate action.

Shane read to me over the phone certain excerpts from a TWC conference record regarding the recent discovery of 38 percent toxaphene in groundwater under Zoecon's facility and that TWC had advised Zoecon to plug and abandon monitoring well PW-5 because it was providing a pathway of contamination to groundwater from a truck loading area. Shane also read a sentence from the conference record which read "TWC agreed to inform Zoecon of any response to the city of Dallas before sending a letter of reply." I stated that it would be useful to see this conference record.

At 2:15 p.m., I was called down to the library on 27 (floor) to meet with Shane. He brought a copy of the conference record and a copy of a January 14, 1987, article by Bill Moore in the Farmers Branch Times. Shane informed me that, as a result of his testimony before the Dallas Environmental Health Commission, the Commission had requested that TWC require additional wells to further investigate groundwater contamination. Apparently the TWC denied the Commission's request. Then on November 6, 1986, the Commission again requested that TWC undertake additional investigation. On November 18, 1986, TWC met with Zoecon in Austin to discuss groundwater contamination. Shane pointed out that the second to last paragraph of this conference record indicated that TWC intended to let Zoecon review any response that TWC would be sending to the Dallas Environmental Health Commission, before sending it. (Copy of conference record is attached.)

Shane also raised concerns about dioxin. There is an allegation that Ronnel, a pesticide manufactured by Dow and used by Zoecon in formulation of some of their products until 1981, contains dioxin. Shane said that Dow had tested their Ronnel and found no dioxin. However, Dow used a relatively high detection limit (in the ppm range). Zoecon's position is that there is no dioxin in its products. However, Zoecon had tested for dioxin in 1981 for its NPDES permit application, indicating a suspicion of dioxin. Shane wants an investigation for dioxin (A copy of the Farmers Branch Times article discussing this issue is attached.)

Attachments

cc: Taylor (6H-CE); Becker (6H-C); Davis (6H); Meacham (6X); Dyer (6T-P);
Huffman (6W-PI); Thomas (6H-EC); Zoecon file

C O N F E R E N C E R E C O R D

Project: Zoecon Corporation SWR No. 30702
Conference date: November 18, 1986 Place: SFA Bldg. #215
Type of conference: Technical
(telephone, staff, formal or informal hearing,
other)

Attendance:

Name	Agency
See attached signature sheet	WV Nov 18 1986 B

Summary:

Zoecon called the meeting to discuss the ground water remediation plan.

Rick Bost gave a brief summary of Zoecon's proposal. They plan to build a slurry wall around the LMR area, and do pumping in the Roach Trap area. They then plan reinjection of treated waste. They are currently performing column tests on activated carbon, and tests of biological treatment. They have installed one test well in the Roach Trap area and one in the LMR area.

Jim Haley stated that Zoecon won't need a permit for treatment processes because they are doing a cleanup. Diana Dutton said she'd write a letter to document that opinion.

Paul Lewis questioned the company's conclusion that the groundwater is flowing towards the creek, since the top of the

Prepared by: Alan Rogers

Zoecon Corporation

Page 2

shale slants away from the creek. Rick Bost stated that there is a hydraulic connection between the groundwater and the creek and that the groundwater modelling shows the same.

Paul Lewis asked if the recovery process will be sufficient to catch the brown fluid that is flowing away from the creek. Rick Bost said yes, studies show that pumping will create a depression, and they use pneumatic eductor pumps set approximately 2' above the Eagle Ford Shale. Rick Bost also stated that the fluid is 38% Toxaphene, heavier than water, and that the model doesn't really address the fluid other than as a source for leaching. The fluid was only found in MW-1, close to an underground tank location.

Table 4-2 gives the proposed schedule.

Paul Lewis inquired if the yield was sufficient for draw down. Rick Bost said yes.

Will Zoecon have enough recharge water if all they use is treated ground water? Company wants to have natural groundwater flushing inside slurry well. Zoecon does not plan to inject water inside the slurry wall.

Zoecon said they would provide the scale and relative location of the computer model's drawings as well as the location of the slurry walls.

The company wanted to know if they should continue filing monthly reports.

Zoecon will continue sampling of TOC and Toxaphene until recovery project is approved. The TWC reserves the right to change sampling plans later, if necessary.

TWC advised Zoecon to plug and abandon PW-5 since they feel it is a pathway to ground water from the truck unloading area.

TWC agreed to inform Zoecon of any response to the City of Dallas before sending letter of reply.

TWC agreed to an extension for deed recordation at facility No. 1 until Zoecon has had a chance to petition the registration unit for a waste classification change.

Alice Rogers
Alice Rogers

AHR/da

cc: Russell Kimble
Richard Clarke - TWC District 4 Office

January 14, 1987

Zoecon tested for dioxin in runoff during 1981

By BILL MOORE
Staff Writer

Despite Zoecon Industries' past statements that it never tested for dioxin on its property or in the adjacent Farmers Branch Historical Park, a document given to the Dallas Environmental Health Commission Monday shows it tested for the deadly chemical in 1981.

The document, originally submitted by Zoecon to the Environmental Protection Agency in 1981 as part of an application for a storm water runoff permit,

showed that dioxin was one of many chemicals tested for.

Jim Thomas, Zoecon's manager of health, safety and environment, said Tuesday that he did not know about the testing but said it only proves that dioxin was not on the site.

"Our position is the same, that there is no reason to test for TCDD, or dioxin," he said. "It is appropriate to test for Ronnell, but not TCDD."

While dioxin was not found, local activist Shane Jackson told the commission that testing for

Turn to ZOECON, page 2A

Zoecon

From page 1A

the deadly toxin proved that Zoecon suspected it was in the water.

Further, because the document said that several other chemicals were not found in the water — although all but one were later discovered in monitoring wells ordered by the Texas Water Commission — Jackson said it reinforces his belief that dioxin is in the park soil.

"Every time we have said that a chemical was used on the property, they (Zoecon) have said it wasn't. Then when we came back and proved it, the response was, 'Yeah, but so what?' And this is the company we are building the Historical Park next to," he said.

Several analyses of park soil have been done over the last two years. Approximately 350 cubic yards of park soil contaminated with the solvent toxaphene and several other chemicals found at the Zoecon site were removed

last summer. Subsequent tests by the Texas Water Commission confirmed that the contaminated soil had been removed and that the area posed no health risk.

Thomas found the document mentioning dioxin in a large stack of documents recently released to him by the EPA's Region VI office in response to his use of the Freedom of Information Act.

Zoecon used at least 33,000 pounds of Ronnell in its formulation of products such as fly baits from 1973-1981, records show. Thomas said all of the Ronnell came from Dow Chemical until the firm quit making it in 1977. Another chemical, methomyl, was then substituted by Zoecon.

Dioxin, according to an EPA "fact sheet", is an "unwanted but almost unavoidable by-product that comes from manufacturing of several commercial substances, chiefly the pesticide 2,4,5-trichlorophenol (2,4,5-TCP)," which is used in

Ronnell.

The Center for Disease Control considers one part per billion of dioxin in soil to be a level of concern in residential areas.

Terry Witt, public relations manager with Dow Chemical in Michigan, said that finding trace amounts of dioxin in an area did not mean that Ronnell had been manufactured there. Trace amounts of dioxin recently have been found at city incineration sites, such as the one in Nashville, and trace amounts could even be present in a home's fireplace, he said.

The Dallas health commission, an advisory body that reports to the Dallas City Council, took Jackson's comments under advisement.

TWC last month denied the commission's request that more test wells be dug in the Historical Park and west of the Zoecon plant on Denton Road.

Farmers Branch Times

A Harte-Hanks Community Newspaper

USPS 736-360

Serving Farmers Branch Since 1956

Times Chronicle-Today Publishing Company, A Division of Harte-Hanks Communications, Inc., 1712 Bell Line Road, Carrollton, Texas 75006. Mailing Address: P.O. Box 110938, Carrollton, Texas 75011-0938.

0373

UNIT. STATES ENVIRONMENTAL PROTECTION AGENCY

OCT 10 1986

Mr. Bryan W. Dixon, Director
Hazardous and Solid Waste Division
Texas Water Commission
P.O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Dixon:

Enclosed is a copy of the draft CDC report regarding Zoecon for your use.

If you have any comments on the content of this report or subsequent CDC
involvement, please contact Carl Hickman at (214) 767-9872.

Sincerely yours,

Sam Becker, Chief
Hazardous Waste Compliance Branch

Enclosure

6H-CE-TAYLOR:trb:x2850:10/07/86

File Code: TXD980508808

		CONCURRENCES					
SYMBOL							
SURNAME							
DATE							

EPA Form 1320-1 (12-70)

OFFICIAL FILE COPY

U.S. GPO 1985-467-853

0374

Zoecon
TYD 98050
8808

DATE: September 1, 1985
SUBJECT: Soil Samples Results From Area Near Zoecon - Dallas
TO: Larry Thomas, 6AW-SE
FROM: Will Focht, 6AW-HE *Will*

While I am not particularly qualified to comment on health risks posed by the levels of pesticides found in these samples, I can nevertheless offer some information which may be helpful.

1. These samples were taken under the directive and direction of the TDWR. Specifically, Ann McGinley and Paul Lewis (117-9-463-7727) are the staff directly involved in approval of the sampling plan and review of the sample results. Whatever corrective action is required (e.g., excavation) will be determined by them following completion of their review.
2. The City of Farmers Branch has been fully involved in every step of this matter.
3. Zoecon has indicated to the TDWR their intention to fully cooperate and to remediate the area as necessary.
4. RCRA is not involved in this matter. TDWR is pursuing this under ancillary provisions of the Texas Water Code and not under their RCRA authorization. There is no information which would indicate that these soil residues constitute hazardous waste subject to RCRA Subtitle C regulation. (For your information, toxaphene in excess of 0.5 ppm (mg/l) which would leach from the soil when subjected to the Extraction Procedure Toxicity Test (EP toxicity) would qualify as a hazardous waste (EPA hazardous waste code, D015). However, to the best of my knowledge, no EP Toxicity tests have been run.)
5. RCRA is currently involved in the on-site closure of four underground tanks. Closure certification should be imminent. This closure is unrelated to the matter at hand.
6. Don Paschal and Bob Murphy in 6AW-P are also reviewing these results. Please contact them. Bob Murphy has indicated to me that the Texas Dept. of Agriculture believes that river backwashing in the vicinity of the stormwater discharge pipes may be a factor in higher concentrations of toxaphene upstream.
7. You may wish to get CDC to look at these results.

If you need more information, please call me at 7-9884.

cc: B.Taylor, 6AW-HE; W.Rhea, 6AW-H; M.Satterwhite, 6AW

0375

Michelle -

Please place this in Zocun's
enforcement file. Thank.

-Will

0376

Zoecon Industries

August 8, 1983



U. S. Environmental Protection Agency
Region VI, Enforcement Division (6E)
1201 Elm Street
Dallas, TX 75270

To Whom It May Concern:

Reference RCRA EPA I.D. number TXD-98-050-8808
assigned to Zoecon Industries, installation
address 12847 Valley Branch, Farmers Branch, TX
75234, please cancel this registration.

Zoecon discontinued leasing a warehouse at the
installation address on September 2, 1982.

If more information is needed, please call Jim
Eklund (214) 243-2321.

Sincerely,

ZOECON INDUSTRIES

James F. Byrne
Safety, Health & Environment Manager

JFB/dp
Attachment

cc: Les Meier
Jim Eklund

70
1

8-16-83

MAILING ADDRESS: 12200 Denton Drive • Dallas, Texas 75234 • (214) 243-2321
CORPORATE ADDRESS: 12000 Ford Road • Dallas, Texas 75234
Telex #730775

0377

Please print or type with ELITE type (12 character inch) in the unshaded areas only.

Form Approved OMB No. 158-579016
4 No. 0245-EPA-07

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY		INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).																																																																																						
INSTALLATION'S EPA I.D. NO.	PLEASE PLACE LABEL IN THIS SPACE																																																																																							
I. NAME OF INSTALLATION																																																																																								
II. INSTALLATION MAILING ADDRESS																																																																																								
III. LOCATION OF INSTALLATION																																																																																								
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<table border="1"> <tr> <td colspan="15">INSTALLATION'S EPA I.D. NUMBER</td> <td colspan="10">APPROVED</td> <td colspan="10">DATE RECEIVED (yr., mo., & day)</td> </tr> <tr> <td colspan="15">F7X098050880821</td> <td colspan="10"></td> <td colspan="10"></td> </tr> </table>			INSTALLATION'S EPA I.D. NUMBER															APPROVED										DATE RECEIVED (yr., mo., & day)										F7X098050880821																																																		
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VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))																																																																																								
<input checked="" type="checkbox"/> A. GENERATION <input type="checkbox"/> B. TRANSPORTATION (complete item VII) <input type="checkbox"/> C. TREAT/STORE/DISPOSE <input type="checkbox"/> D. UNDERGROUND INJECTION																																																																																								
VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))																																																																																								
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):																																																																																								
VIII. FIRST OR SUBSEQUENT NOTIFICATION																																																																																								
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.																																																																																								
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Please go to the reverse of this form and provide the requested information.																																																																																								

0378

I.D. - FOR OFFICIAL USE ONLY

W 7 X D 9 8 0 5 0 8 8 0 8 2 1

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
7	8	9	10	11	12
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
19	20	21	22	23	24
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
25	26	27	28	29	30
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
37	38	39	40	41	42
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34
43	44	45	46	47	48
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 24	25 - 26	27 - 28	29 - 30	31 - 32	33 - 34

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)☐ 2. CORROSIVE
(D002)☐ 3. REACTIVE
(D003)☒ 4. TOXIC
(D000) See below

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

Larry Grubb

NAME & OFFICIAL TITLE (type or print)

LARRY GRUBB

DATE SIGNED

8-12-80

EPA Form 8700-12 (6-80) REVERSE

E. 4. Small quantity generator per 261.5

RECEIVED

AUG 18 1980

6AEP

0379

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Zoecon File

TXD780508808

APR 18 1986

Mr. Paul West
City Manager
City of Farmers Branch
13000 Wm. Dodson Parkway
Farmers Branch, Texas 75234

Dear Mr. West:

Thank you for the letter on your behalf from Mr. John Boyle, of Jenkins, Hutchison & Gilchrist, dated March 21, 1986, regarding Zoecon Industries' compliance with the Resource Conservation and Recovery Act requirements for third party liability coverage in the event of non-sudden accidental occurrences.

Enclosed is a letter to Mr. Shane Jackson, dated March 29, 1986, prepared in response to his inquiries about Zoecon's insurance coverage. I hope that response will satisfactorily address your concerns. Should you have any questions or need further information, please do not hesitate to contact me.

Sincerely yours,

/s/ Frances E. Phillips for

Dick Whittington, P.E.
Regional Administrator

Enclosure

cc: Bryan Dixon
Texas Water Commission

bcc: M. Knudson (6W)
R. Hartung (6W-E)
L. Thomas (6H-EC)
W. Hathaway (6T)
P. Seals (6C)
D. Whittington (6A)
F. Phillips (6A)
P. Charles (6X)
J. Floeter (6M)

0380

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Mr. Paul West
City Manager
City of Farmers Branch
13000 Wm. Dodson Parkway
Farmers Branch, Texas 75234

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Sincerely yours,

Dick Whittington, P.E.
Regional Administrator

Enclosure

cc: Bryan Dixon
Texas Water Commission

bcc: M. Knudson (6W)
R. Hartung (6W-E)
L. Thomas (6H-EC)
W. Hathaway (6T)
P. Seals (6C)
D. Whittington (6A)
F. Phillips (6A)
P. Charles (6X)
J. Floeter (6M)

CONCURRENCES

SYMBOL	6H-CE: HTRB000110: hnt: X2850: 4-5-86					
SURNAME	6H-CE	6H-CE	6H-CE	6H-CE	6H-CE	6H-CE
DATE	Taylor	Becker	Davis	Goetz		

EPA Form 1320-1 (12-70)

6C-11 4-11

4/11/86

OFFICIAL FILE COPY

0381



*See from F-B confirming
request for clarification of
Zoecon's status on RCRA liability
coverage.*
RECEIVED
MAR 24 1986
MANAGEMENT DIVISION OFFICE

March 21, 1986

Ms. Kay Crouch
Texas Water Commission
P.O. Box 13087
Capitol Station
Austin, Texas 78711-3087

Mr. John Floeter
United States Environmental Protection Agency
Region VI
1201 Elm Street
Dallas, Texas 75234

Dear Ms. Crouch & Mr. Floeter:

RE: RCRA Liability Coverage, Zoecon Corporation

The undersigned represents the City of Farmers Branch in the capacity of City Attorney.

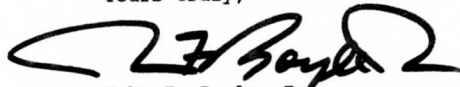
During the morning of March 21, I discussed with each of you the question of whether Zoecon Corporation was in compliance with 40 CFR 264. - 265.147 insurance requirements. This question arose as a result of receipt of a letter dated January 14, 1986 from Russell Kimble to Eugene L. Prukalski, copy attached. This letter was received by the City on the evening of March 20, 1986 from a local citizen.

According to Ms. Crouch the letter of January 14, 1986 does not reflect the correct status of the subject as Zoecon Corporation does have "sudden and accidental pollution" coverage which is all that is required. It is my understanding that the "non-sudden and accidental pollution" coverage is required only in plants that treat or dispose of certain products on site. The letter of January 14, 1986 was apparently in error and a letter from each of you is to be sent to Mr. Paul West, City Manager for the City of Farmers Branch, confirming the matters set out in this letter.

0382

We appreciate your cooperation and prompt response.

Yours truly,

A handwritten signature in dark ink, appearing to read "JF Boyle Jr", with a large, sweeping initial "J" and a stylized "B".

John F. Boyle, Jr.
Jenkins, Hutchison & Gilchrist

JFB/tlk

cc: Paul M. West

0383

TEXAS WATER COMMISSION

RECEIVED

Paul Hopkins, Chairman
 Ralph Roming, Commissioner
 John O. Houchins, Commissioner



January 14, 1986



MAR 20 1986

Larry R. Sowers, Executive Manager
 Mary Ann Hefner, Chief Clerk
 James K. Rourke, Jr., General Counsel

Mr. Eugene L. Prukalski
 Sandoz Corporation
 608 Fifth Avenue
 New York, New York 10020

RE: RCRA Liability Coverage, Zoecon Industries
 Texas Water Commission Registration Number 30702

JAN 17 1986

Dear Mr. Prukalski:

> Thank you for your letter of December 30, 1985 describing the efforts of Sandoz to obtain liability coverage for the above referenced facility. With regard to your request for a waiver of the January 1, 1986 deadline for obtaining new coverage, we presently have no mechanism by which we can grant such a waiver. However, as you may already know, there is a bill pending before the U.S. Congress (Bill #HR 3917) which would allow EPA to extend interim permitting status for facilities that have shown a good faith effort to comply with both groundwater monitoring and financial assurance requirements. The bill would allow EPA to grant facilities an initial 45-day extension of interim status; a second extension until June 30, 1986 could be granted, with an additional extension to November 8, 1986 if it can be demonstrated that the insurance market continues to be constrained.

To my knowledge, this bill has yet to be passed by the Senate. Until such time as there is some amendment to the present regulations, facilities that do not have complete and adequate liability insurance coverage are in violation of 40 CFR 264.-265.147 requirements. Please continue to keep this agency informed of your efforts and status. If you require assistance, please contact Ms. Kay Crouch of our Hazardous and Solid Waste Division at 512/463-7761.


Sincerely,

Russell Kimble, Head
 Program Support Unit
 Program Support Section
 Hazardous and Solid Waste Division

KC:kc

CC: Texas Water Commission District 4 Office

0384

 ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)	
<p>This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.</p>	
EPA I.D. NUMBER	TXD-98-050-8808
	ZOECON INDUSTRIES P.O. BOX 340231 DALLAS, TX 75234
INSTALLATION ADDRESS	12847 VALLEY BRANCH FARMERS BRANCH, TX 75234

EPA Form 8700-12B (4-80)

0385

FJB



**FARMERS
BRANCH**

"BEST LIVING PLACE"

John D. Dood
Mayor
Bob C. Phelps
Mayor Pro Tem
Council Member Place 4

Council Members
David D. Blair, Jr.
Place 1
John Dunagan
Place 2
Celia Davis
Place 3
Herb Weidinger
Place 5

Richard L. Escalante
City Manager

RECEIVED
EPA REGION 1

3 APR 33 PM 4:1

HAZARDOUS WASTE MCM

TXD980508808

April 8, 1988



Mr. Allen Beinke
Executive Director
Texas Water Commission
P. O. Box 13087, Capitol Station
Austin, Texas 78711

Dear Mr. Beinke:

In a letter addressed to you dated January 28, 1988, the City of Farmers Branch requested that the Texas Water Commission require Zoecon to install additional piezometers in the City's Historical Park for groundwater monitoring. This request was made because of an EPA study which cast doubt on the ability of a soil/gas monitoring study used in the park to accurately map the groundwater contamination plume.

As of this date, the City has not received any response from you or from your staff. We would appreciate a response to this request. We look forward to receiving your reply.

Thank you for considering this matter.

Sincerely,

Richard L. Escalante
Richard L. Escalante
City Manager



RLE/jp

cc: Joseph H. Lavin, Zoecon Corporation
Susan Ferguson, Texas Water Commission
Kenny Marchant, State Representative
John Bryant, U.S. House of Representatives
Steve Bartlett, U.S. House of Representatives
Dick Armey, U.S. House of Representatives
Annette Strauss, Mayor, City of Dallas
Robert E. Layton, Jr., U.S. EPA
Fred Barnes, City of Dallas Health & Human Services
John Dodd, Mayor, City of Farmers Branch
City Council, City of Farmers Branch

386



PO BOX 819010
FARMERS BRANCH
TEXAS 75381-9010



Mr. Robert E. Layton, Jr.
United States Environmental
Protection Agency

~~Washington, D.C. 20460~~

DALLAS TX



1062

NATL HAND TOOL/OF MECH TOOLS
FARMERS BRANCH TX

TXD987986098
RC NT VOL 01

478A.TXD987986098 0001

NATL HAND TOOL/OF MECH TOOLS
FARMERS BRANCH, TX 75234



000000003737

HZ/RC/NT

478A.TXD987986098 0001

1098

1063



12827 VALLEY BRANCH LANE • DALLAS, TEXAS 75234

 FAX: 214/247-1237
 94 AUG 25 PM 12:41 PHONE: 214/247-1367

August 18, 1994

TNRCC & NHT DIVISION...

Mr. Bennard L. Nelson, Jr.
 Data Control Team
 Waste Evaluation Section
 Industrial & Hazardous Waste Division
 P. O. box 13087
 Austin, Texas 78711-3087

Dear Mr. Nelson:

National Hand Tool (NHT) has been registered with the Texas Natural Resource Conservation Commission (TNRCC) for its solid waste generation and management. Its state registration number is 32199.

NHT has been noticed that there are two EPA I.D. Numbers being used in the Annual TRI Form Reporting mails from one of the TNRCC offices. These two EPA I.D. Number are TXT490012259 and TXD987986098.

All the reports filed from this facility to EPA, State, and local agencies are currently using TXD987986098, if the EPA I.D. Number is required.

To avoid any communication confusion or report duplication, NHT would request your office to erase one of the EPA I.D. Number of "TXT490012259" in your National Hand Tool Solid Waste Registration (State I.D. Number of 39185) file immediately.

If you have any question regarding this request, please write to me or call me at (214) 247-1367.

Your letter of indicating our request being processed will be appreciated. Thank you for your consideration and assistance.

Sincerely,

K. C. Yiin
 Environmental Control Manager

042343

BN



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY

02/05/90

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ->	TXD987986098
FACILITY NAME ->	NATIONAL HAND TOOL DIV OF MECH TOOLS
MAILING ADDRESS ->	12828 VALLEY BRANCH LANE FARMERS BRANCH, TX 75234
INSTALLATION ADDRESS ->	12828 VALLEY BRANCH LANE FARMERS BRANCH, TX 75234

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE
DALLAS, TEXAS 75202

ATTN: RCRA INFORMATION MANAGEMENT SECTION (6H-H1)

TO: COLE JAMES CHEM ENG
NATIONAL HAND TOOL DIV OF MECH TOOLS
12828 VALLEY BRANCH LANE
FARMERS BRANCH, TX 75234

ID — For Official Use Only									
C								T/A	C
W									1

Description of Hazardous Wastes (continued from front)

Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. Characteristics of Nonlisted Hazardous Wastes. Mark "X" in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature 	Name and Official Title (type or print) President + General Manager	Date Signed 1/5/90
---------------	--	-----------------------

478A.TXD987986098 0002
STANLEY MECHANICS TOOLS
FARMERS BRANCH, TX 75234



\$000216473

HZ/RC/NT

478A.TXD987986098 0002

8901

0202 0000 2609

In 10/15/97am

STANLEY

Reg # 39185

V. 2
3737

October 3, 1997

Certified Mail
Z698 471 881
Return Receipt Requested

TNRCC/Waste Evaluation Section
Mail Code MC 129
Waste Analysis Team
P.O. Box 13087
Austin, Texas 78711-3087

RE: National Hand Tool (NHT)
12827 Valley Branch Lane
Dallas, TX 75234

SWR# 39185
TXD987986098

Inactivate Waste Stream/Name Change

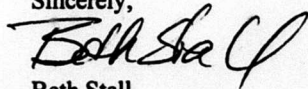
Dear Sir or Madam:

Please inactivate waste code #00052061 (Waste Oil) for the above referenced facility.
Per 30 TAC Chapter 324, nonhazardous oil going for recycle is exempt from
classification and coding.

In addition, the name for the above referenced facility has been changed from National
Hand Tool to **Stanley Mechanics Tools**.

If you have any questions, please feel free to contact me at (972) 919-7452.

Sincerely,



Beth Stall
EHS Coordinator
Stanley Mechanics Tools

cc: TNRCC Region 4 Office - Arlington

5126
DCAM



12827 VALLEY BRANCH LANE • DALLAS, TEXAS 75234

94 AUG 25 PM 12:12 FAX: 214/247-1237
PHONE: 214/247-1367

August 18, 1994

INDUSTRIAL & HAZARDOUS WASTE DIVISION

Mr. Bennard L. Nelson, Jr.
Data Control Team
Waste Evaluation Section
Industrial & Hazardous Waste Division
P. O. box 13087
Austin, Texas 78711-3087

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All the reports filed from this facility to EPA, State, and local agencies are currently using TXD987986098, if the EPA I.D. Number is required. *already NHT in RCRIS*

3-17
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Sincerely,

K.C. Yiin

K. C. Yiin
Environmental Control Manager

1022103

Do not make entries in shaded areas

ENVIRONMENTAL PROTECTION AGENCY

Generator Biennial Hazardous Waste Report for 1985 (cont.)

This report is for the calendar year ending December 31, 1985

GENERATOR'S NAME:

Date rec'd: Aug. 8, 1986 Rec'd by: R. Townsend

XV. GENERATOR'S EPA I.D. NO.

TAC

GT X T4 9 0 1 2 2 5 9 1
1 2 13 14 15

XVI. WASTE MINIMIZATION (narrative description)

In 1985 we at National Hand Tool made several process changes to minimize our wastes:

1. Purchased and installed a new 150 GPM waste treatment system. By doubling the size of our old system this allowed us to treat and neutralize acid-alkali wastes that before were drummed and shipped to Class I Landfills. This also allowed us to maintain a constant effluent water quality that meets or surpasses all Federal, State, and local requirements.
2. All used oils are now de-watered and sent to a recycling plant for reuse by National Hand Tool Corporation or submitted to the Alternative Fuels Program.
3. Reduced the amount of tumbling sand disposed of by changing our process to an accelerated vibratory process which reduces effluent waste, time, and money.
4. Changed all of our machine coolants to synthetics. We never have to dispose of these, only make additions on a daily basis.

In 1986, we plant to make even more changes to minimize our wastes.

Russell Townsend

Russell Townsend
Chemical Engineer



FY 1983 HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

14. Handler Type 1-1 Major

IX: Mon-Nor

DO. AGENCY RESPONSIBLE FOR **E - EPA**

Put cards in box 1-6

-C-m-Contractor/EPA

1 = Evaluation Inspection
2 = Sampling Inspection

**Put eggs in
cheese and**

4 = Ground Water Monitoring Evaluation
5 = Follow Up

- 4 = Other - Citizen Complaint
- 7 = Other - Part B Coll-In
- 8 = Other - Withdrawal Candidates
- 9 = Other - Closed Facility
- 0 = Other - General

DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 511) 851031/5 3-27-85

Class of Violation	Area of Violation					
	GUN	CL/PC	Fin. Rec.	Pt. B.	Capl. Sch. Manifest	Other
I						0
II						0

Area of Violation- (use-code)	Date Action Taken	Compliance Dates Scheduled- Actual	Penalty Assessed- Collected	Resp. As- (use-code)

Codes for Types of Enforcement Actions:
 03 = Warning Letter
 05 = Administrative Order
 11 = Fined Civil Action
 12 = Fined Criminal Action

(See instruction for additional codes) 10 - Informal
Codes for Responsible Agency: E - EPA 8 - State X - EPA oversight
13 - EPA letter to States

(Limit each comment to 80 characters. Up to 99 comments are possible.)

TX 490012229

HAZARDOUS WASTE COMPLIANCE MONITORING AND ENFORCEMENT LOG

NEW ☒ UPDATE

OWNER ID: 32799

1. EPA ID: TX T490012259

INDUSTRY: NHT CORP

DISTRICT: 04

INDUSTRY NAME: National Hand Tool Corp.

PHONE: (214) 247-1367

SITE ADDRESS: 12827 Valley Branch Lane

ZIP: 75229

COUNTY: Dallas

DATE SUB: 02-15-85

FACILITY: G

4. MAJOR/NONMAJOR: N

6. TYPE OF EVALUATION: FO

(CEI-EV, EC; CME-GW; OTHER-CL, SW; SAMPLE-SA; FOLLOW UP-FO; RECORD REVIEW-RC, RF; FOR HIGH PRIORITY PLACE H IN 1ST BLOCK)

(CENTRAL OFFICE USE ONLY)

DATE OF INITIAL EVALUATION: 10-11-84

RESPONSIBLE AGENCY: S

E V A L		D E G		AREA AND CLASS OF VIOLATION (INCLUDES DISTRICT LEVEL ENFORCEMENT ACTIONS)												Date of Actual Compliance		Resolv/Unres/Complaint			
				Date Notice of Violation		Date Conference		Date Refer. to Austin for Enf.		Date High Prior. Determination		Date of Estim. Compliance		Date Response is Due for Nov.							
W																					
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
L																					
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
T																					
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
A																					
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
I																					
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
C																					
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
T	X	0	0	0	1	2	8	8	5												
57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76		
COMMENTS: (COUNTY)				sa																sa	
0	0	1	0	5	7	0	6	e	f	0	R	0	1	0	0	R					
1	3	5	7	9	12	14	16	18	21	23	25	27	30	32	34	36	39	41	43		
0	0	2																			
1	3	5	7	9	12	14	16	18	21	23	25	27	30	32	34	36	39	41	43		

WORK NO: 9091

NO. OF SAMPLES: 1

SUBMITTED BY: Sandra Antoinette

RECEIVED
ENFORCEMENT AND
FIELD OPERATIONS

JAN 31 '85

RECEIVED

U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITYINSTALLATION'S EPA
I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION
MAILING
ADDRESSIII. LOCATION
OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

FTXT49001225921

801113

000004

I. NAME OF INSTALLATION

NHT MANUFACTURING

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

12827 VALLEY BRANCH LANE

CITY OR TOWN

FARMERS BRANCH

ST.

ZIP CODE

TX 75234

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

12827 VALLEY BRANCH LANE

CITY OR TOWN

FARMERS BRANCH

ST.

ZIP CODE

TX 75234

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

DONALD B SHEA VP OPNS

PHONE NO. (area code & no.)

214-247-1367

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

K R CHOW ET ALK

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

A. GENERATION

B. TRANSPORTATION (complete item VII)

TREAT/STORE/DISPOSE

D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

A. AIR

B. RAIL

C. HIGHWAY

D. WATER

E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

A. FIRST NOTIFICATION

B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. - FOR OFFICIAL USE ONLY

W	7	X	T	4	9	0	0	1	2	2	5	9	2	1
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☐ 4. TOXIC
(D000)
X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME, OFFICIAL TITLE (type or print)

DONALD B. SHEA VP OPNS

DATE SIGNED

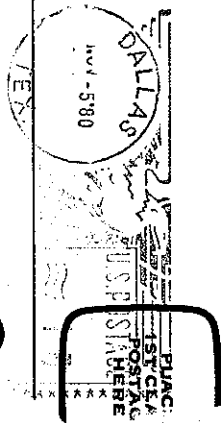
11/1/80

1/14/77 M.F.G.

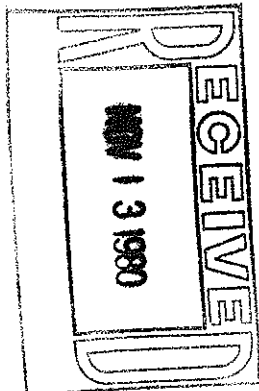
12827 Valley Branch

Farmer's Branch, Tx

TXI 4900-1225-9



6A59



NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

SDA Region VI
Attal 6439
1201 Elm St
First International Bldg
Dallas TX 75270

DETACH ALONG THIS LINE

9-11-87
DA

DATA ENTRY Form

E.P.A. IDENTIFICATION

TxD081748600

PREPARED

NA

DATE

9/9/87

PRINT PLEASE PRINT PLEASE PRINT PLEASE

COMPANY NAME																													
MAILING ADDRESS																				CITY					STATE		ZIP CODE		
COMPANY CONTACT PERSON																				TELEPHONE NUMBER									
LOCATION ADDRESS																				CITY					STATE		ZIP CODE		
OWNERS NAME																				OWNERSHIP CODE									
FACILITY STATUS										OTH OTHER CODE-																			
GEN TRN TSD UIC										B7B SQO										C303-1									
ADD WASTE CODES										DELETE WASTE CODES																			
ADD PROCESS CODES										DELETE PROCESS CODES																			
OTHER CODING																													

ENTERED BY

R.U.

DATE

9.9.87

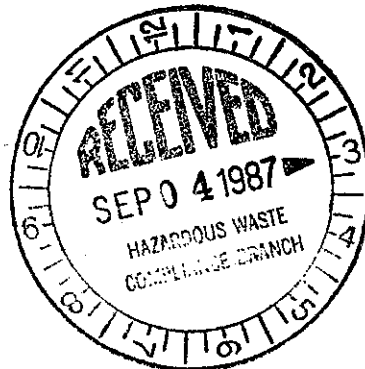
Lee Haze



PPG Industries, Inc. P.O. Box 814645 Dallas, Texas 75381 (214) 243-8211
2435 Squire Place Suite 3 Farmers Branch, Texas 75234

Dallas Metals Distribution
Commercial Products and Distribution
Glass Group

28 August 1987



United States Environmental
Protection Agency
Hazardous Waste Division
Washington, D.C. 20460

6
Re: EPA I.D. No. TXD081748X00

This letter will serve notice that PPG Industries, Inc. has sold its facility located at 12900 Nicholson Road, Farmers Branch, Texas 75234 on 31 July 1987.

With the sale of this facility, it is requested that you please cancel the "EPA I.D. Number" listed above.

Further communications regarding this request should be directed to:

PPG Industries, Inc.
Mr. G. E. Palcheck
One PPG Place
Pittsburgh, Pennsylvania 15272

Sincerely,


James M. Koepfel
Director, Staff Services

JMK/jkb



Called ↑ 9/9/87
RE: ID# AND site identification

\$ 1102 C303=1

NOTICE OF REGISTRATION
REGISTRATION NUMBER: 32322
COMPANY NAME: P P G INDUSTRIES, INC.

PAGE 1

NS330-87

DWD550

TEXAS DEPARTMENT OF WATER RESOURCES
NOTICE OF REGISTRATION
INDUSTRIAL SOLID WASTE GENERATION/DISPOSAL

01-07-85

THIS IS NOT A PERMIT AND DOES NOT CONSTITUTE AUTHORIZATION OF ANY WASTE MANAGEMENT ACTIVITIES OR FACILITIES LISTED BELOW. REQUIREMENTS FOR SOLID WASTE MANAGEMENT ARE PROVIDED BY TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TEXAS DEPARTMENT OF WATER RESOURCES (TDWR). CHANGES OR ADDITIONS TO WASTE MANAGEMENT METHODS REFERRED TO IN THIS NOTICE REQUIRE WRITTEN NOTIFICATION TO THE TDWR.

DATE OF NOTICE: 12-30-84

REGISTRATION DATE: 04-30-82

REGISTRATION NUMBER: 32322

EPA I.D. NUMBER: NOT APPLICABLE

THE REGISTRATION NUMBER PROVIDES ACCESS TO STORED INFORMATION PERTAINING TO YOUR OPERATION. PLEASE REFER TO THAT NUMBER IN ANY CORRESPONDENCE.

COMPANY NAME: P P G INDUSTRIES, INC.
MAILING ADDRESS: FARMERS BRANCH
P O BOX 344129
FARMERS BRANCH, TEXA 75234

GENERATING SITE LOCATION:

12900 NICHOLSON RD. FARMERS BRANCH TX
CONTACT PERSON: L L FRANZMEIER
PHONE: (214) 243-8141
NUMBER OF EMPLOYEES: 100 - 249
TDWR DISTRICT: 04

REGISTRATION STATUS: ACTIVE
HAZARDOUS WASTE STATUS: SMALL QUANTITY GENERATOR



I. WASTE GENERATED:

WASTE NUMBER	DESCRIPTION	CLASS	CODE	DISPOSITION
001	METAL DUST COMPOUNDS	I	174050	NO LONGER GENERATED
002	PLANT REFUSE, GENERAL MISC.	II	279760	OFF-SITE
003	MINERAL SPIRITS	IH	914810	ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS): 0001

004 METHYLENE CHLORIDE IH 910870 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS):

005 METHYL ETHYL KETONE IH 910050 ON-SITE/OFF-SITE

EPA HAZARDOUS WASTE NOS. (REFER TO 40 CFR PART 261 FOR DESCRIPTIONS):

II. SHIPPING/REPORTING: PURSUANT TO TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TDWR PERTAINING TO INDUSTRIAL SOLID WASTE MANAGEMENT, ISSUANCE OF MANIFESTS AND MONTHLY REPORTING ARE REQUIRED FOR OFF-SITE STORAGE/PROCESSING/DISPOSAL OF THE FOLLOWING CLASS I WASTES LISTED IN PART I.

PREPARE A MONTHLY WASTE SHIPMENT SUMMARY AND SUBMIT IT ALONG WITH THE GREEN COPY OF THE MANIFEST(S) FOR EACH MONTH THAT SHIPMENTS OF THE FOLLOWING WASTE(S) ARE MADE. NO MONTHLY WASTE SHIPMENT SUMMARY IS REQUIRED FOR MONTHS WHEN SHIPMENTS ARE NOT MADE.

003 914810 MINERAL SPIRITS
004 910870 METHYLENE CHLORIDE
005 910050 METHYL ETHYL KETONE

III. ON-SITE WASTE MANAGEMENT FACILITIES:

FAC NO.	FACILITY	STATUS
01	MISCELLANEOUS STORAGE CONTAINERS STORAGE OF WASTE NUMBER(S) 003, 004, 005	ACTIVE

UNLESS OTHERWISE STATED ABOVE, FACILITIES ARE LOCATED
AT 12900 NICHOLSON RD. FARMERS BRANCH TX
COUNTY OF TARRANT

IV. RECORDS.

A. FOR PURPOSES OF FILING ANNUAL REPORTS PURSUANT TO TEXAS ADMINISTRATIVE CODE SECTION 335 OF THE RULES OF THE TDWR PERTAINING TO INDUSTRIAL SOLID WASTE MANAGEMENT, RECORDS SHOULD BE MAINTAINED FOR STORAGE, PROCESSING AND/OR DISPOSAL OF THE FOLLOWING WASTE(S) LISTED IN PART I:

002 279760 PLANT REFUSE, GENERAL MISC.
003 914810 MINERAL SPIRITS
004 910870 METHYLENE CHLORIDE

NOTICE OF REGISTRATION (CONTINUED)

PAGE 3

REGISTRATION NUMBER: 32322

COMPANY NAME: P P G INDUSTRIES, INC.

005 910050 METHYL ETHYL KETONE



MH

PPG Industries, Inc. 12900 Nicholson Road P.O. Box 814129 Farmers Branch, Texas 75381 (214) 243-8141

Commercial Products
Glass Division
August 22, 1986

Mr. Thomas D. Crane
U.S. EPA
Hazardous Waste Programs Branch
Administrative Section (6H-HA)
1201 Elm Street
Dallas, Texas, 75270

Dear Mr. Crane,

I am in receipt of your letter dated August 7, 1986 regarding the submission of Waste Minimization Information.

Please note that the Farmers Branch Facility of PPG Industries, Inc., had applied and was granted a "Small Quantity Generator Status" in August 1984 with a January 1985 updated permit with the registration number of 32322, and EPA I. D. number of TXD 08-174-8600 (copy attached).


None-the-less, in September 1985, the Farmers Branch Facility of PPG did submit to your office a copy of the Waste Minimization Policy for the Facility (copy attached).

Since submission of our Waste Minimization Policy, the Farmers Branch Facility has utilized this policy to eliminate Wastes 004, Methilene chloride, and 005, Methyl Ethel Ketone as listed on permit 32322.

Additionally, waste 002, plant refuse, has been reduced by 40%.

It is requested that you please update your records so as to show that the Farmers Branch Facility of PPG Industries, Inc, TXDO81748600 is in full compliance with the RCRA section 3002 (A)(6).

Should you have any further questions, please contact me at (214) 243-8141.


J.M. Koeppe
Director, Employee Relations

cc: J. Covington
V. Lupoi
W. Swanson



PPG Industries, Inc. 12900 Nicholson Road P.O. Box 814129 Farmers Branch, Texas 75381 (214) 243-8141

Contract and Supply
Glass Division

SEPT. 1985

WASTE MINIMIZATION AND DISPOSAL POLICY

PPG INDUSTRIES, INC.
DALLAS GLASS FAB CTR.
FARMERS BRANCH, TEXAS

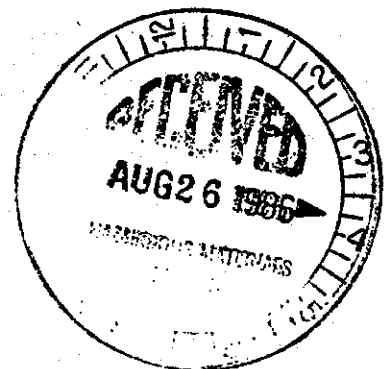
TXD 08178600

PURSUANT TO SECTION 3002 (B) OF THE RESOURCE CONSERVATION AND RECOVERY ACT, THE DALLAS GLASS FABRICATION CENTER HAS DEVELOPED A PROGRAM WITH THE OBJECTIVE OF MINIZING THE QUALITY AND TOXICITY OF HAZARDOUS WASTE PRODUCED AT THIS LOCATION. THIS PROGRAM IS THE RESULT OF A COOPERATIVE EFFORT BETWEEN PRODUCTION AND SERVICE DEPARTMENTS. THE PROGRAM WILL UTILIZE METHODS SUCH AS THE FOLLOWING TO ACHIEVE THE OVERALL OBJECTIVES AS STATED ABOVE AND WILL CONSIDER THE ECONOMIC PRACTICALLY OF THEIR USE;

1. SUBSTITUTION OF LESS TOXIC MATERIALS THAN THOSE PRESENTLY USED IN PROCESSES PRODUCING HAZARDOUS WASTE.
2. PROCESS CHANGES WHICH WILL RESULT IN THE GENERATION OF LESS HAZARDS WASTE AND IN A FORM WHICH WILL BE NON-HARZARDOUS OR LESS-HARZARDOUS.
3. RECYCLING AND RE-USE OF WASTE MATERIALS BOTH ON AND OFF-SITE.
4. PERSONNEL TRAINING WHICH COMMUNICATES TO EMPLOYEES INVOLVED WITH WASTE PRODUCING OPERATIONS BOTH THE METHODS AVAILABLE TO MINIMIZE WASTE PRODUCED AND THE MEANS TO ASSURE ITS PROPER HANDLING AND PACKAGING FOR DISPOSAL.

V. Lupei

V. LUPOI
MANAGER, FABRICATION





**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• TXD 08 174 8600

1-15-85

PPG INDUSTRIES INC-DALLAS FAB CENTER
P.O. BOX 814129
FARMERS BRANCH, TX 75381

INSTALLATION ADDRESS


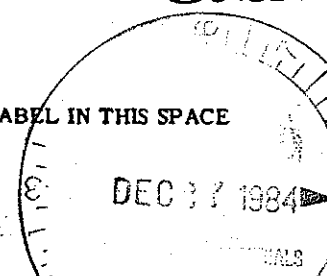
sent

1-15-85

12900 NICHOLSON RD
FARMERS BRANCH, TX 75381

GSA No. 12345-XX
Form Approved OMB No. 158-R00XX

Please print or type with ELITE type 12 characters/inch in the shaded area only.

		U.S. ENVIRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY	INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).
I. NAME OF INSTALLATION II. MAILING ADDRESS III. LOCATION OF INSTALLATION		PLEASE PLACE LABEL IN THIS SPACE 	
INSTALLATION I.D. NO.		32322	
I. NAME OF INSTALLATION II. MAILING ADDRESS III. LOCATION OF INSTALLATION		32322	

FOR OFFICIAL USE ONLY	
COMMENTS	
C 1-15-85	

INSTALLATION I.D. NUMBER	APPROVED	DATE RECEIVED (mo., day, & yr.)
512900	1	1-15-85

I. NAME OF INSTALLATION	
PPG INDUSTRIES INC - DALLAS FAB CENTER	

II. INSTALLATION MAILING ADDRESS	
STREET OR P.O. BOX	
P.O. BOX 814129	

CITY OR TOWN		ST.	ZIP CODE
FARMERS BRANCH		TX	75381

III. LOCATION OF INSTALLATION	
STREET OR ROUTE NUMBER	
12900 NICHOLSON RD	

CITY OR TOWN		ST.	ZIP CODE
FARMERS BRANCH		TX	75381

IV. INSTALLATION CONTACT	
NAME AND TITLE (last, first, & job title)	
FRANZMEIER L.L. MANAGER	
PHONE NO. (area code & no.)	
214-243-8141	

V. OWNERSHIP	
A. NAME OF INSTALLATION'S LEGAL OWNER	
PPG INDUSTRIES INC.	

B. TYPE OF OWNERSHIP (enter the appropriate letter into box):		VI. TYPE OF HAZARDOUS WASTE ACTIVITY	
F = FEDERAL	M = NON-FEDERAL	57 <input checked="" type="checkbox"/> A. GENERATION	58 <input type="checkbox"/> B. TRANSPORTATION (complete item VII)
		59 <input type="checkbox"/> C. TREAT/STORE/DISPOSE	60 <input type="checkbox"/> D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only)	
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):	

VIII. FIRST OR SUBSEQUENT NOTIFICATION	
Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. number in the space provided below.	

<input checked="" type="checkbox"/> A. FIRST NOTIFICATION	<input type="checkbox"/> B. SUBSEQUENT NOTIFICATION (complete item C)	C. INSTALLATION'S EPA I.D. NO. 32322
---	---	---

IX. DESCRIPTION OF HAZARDOUS WASTES	
Please go to the reverse of this form and provide the requested information.	

I.D. NO. -- FOR OFFICIAL USE ONLY									
S									
W									
1	2	3	4	5	6	7	8	9	10

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F002 23 - 26	2 F005 23 - 26	3 23 - 26	4 23 - 26	5 23 - 26	6 23 - 26
7 23 - 26	8 23 - 26	9 23 - 26	10 23 - 26	11 23 - 26	12 23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 23 - 26	14 23 - 26	15 23 - 26	16 23 - 26	17 23 - 26	18 23 - 26
19 23 - 26	20 23 - 26	21 23 - 26	22 23 - 26	23 23 - 26	24 23 - 26
25 23 - 26	26 23 - 26	27 23 - 26	28 23 - 26	29 23 - 26	30 23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 23 - 26	32 23 - 26	33 23 - 26	34 23 - 26	35 23 - 26	36 23 - 26
37 23 - 26	38 23 - 26	39 23 - 26	40 23 - 26	41 23 - 26	42 23 - 26
43 23 - 26	44 23 - 26	45 23 - 26	46 23 - 26	47 23 - 26	48 23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49 23 - 26	50 23 - 26	51 23 - 26	52 23 - 26	53 23 - 26	54 23 - 26
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E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark 'X' in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.23.)

☒ 1. IGNITABLE☒ 2. CORROSIVE☐ 3. REACTIVE☒ 4. TOXIC

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE



OFFICIAL TITLE

L. L. Franzmeier, Manager

DATE SIGNED

12-7-84

EPA Form 8700-12 (2-80) REVERSE

[Editor's note]